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1
              IN THE UNITED STATES DISTRICT COURT
 2
               FOR THE CENTRAL DISTRICT OF UTAH
 3
                             -000-
 4
     OL PRIVATE COUNSEL, LLC, a
     Utah limited liability
 5
     company,
               Plaintiff,
 6
                                      2:21-CV-00455-DDB-DAO
 7
                                      Honorable David Barlow
         v.
     EPHRAIM OLSON, an
 8
     individual,
 9
               Defendant.
10
11
12
13
14
          VIDEO RECORDED DEPOSITION OF CAROLYN OLSON
15
16
                Taken on Friday, July 8, 2022
17
                          At 1:08 p.m.
18
19
                       At Foley & Lardner
                     299 South Main Street
20
21
                           Suite 2000
22
                  Salt Lake City, Utah 84111
23
24
25
     Reported by: Emily A. Gibb, RPR, CSR, CCR
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Pages 118..121

July (18, 2022 Pages 118121
Page 118 1 A. Well, I know that he the trust that he	Page 120
2 put in I thought was for tax purposes that he had	2 A. Yes.
3 created to be the lender of that	3 Q. And his mother is also a U.S. citizen?
4 (Clarification by the Reporter.)	4 A. Yes.
5 THE WITNESS: \$700,000, which was the	7.1. 1.00.
	, , , , , , , , , , , , , , , , , , , ,
6 mortgage on the house. 7 BY MS, VAUGHN:	
	7 Q. Is her name Collette Olson Williamson?
8 Q. So we've we've talked about this box of	8 A. Yes.
9 documents.	9 Q. Do you know if she is a U.S. citizen?
10 When I reference the box of documents in the	7
11 garage, do you know what I'm talking about?	11 Q. How do you know that?
12 A. I do.	12 A. She's living in Texas, and I know when
13 Q. Who found this box?	13 she I mean, she just told everybody she's so
14 A. I did.	14 excited about getting
15 Q. Okay. And what were you doing when you	15 Q. How did she prove her citizenship?
16 found it?	16 A. Through her mom and dad.
17 A. I was cleaning the garage.	17 Q. Through her parents?
18 Q. All right. Where was it when you found it?	18 A. Her parents.
19 Was it like near other stuff?	19 Q. The same parents that Tom Olson has?
20 A. There was some it was called monitors and	20 A. Yes.
21 things. I'm not sure if it was right by them, but	21 Q. You're you are a U.S. citizen.
22 those all things were there.	22 A. I am.
23 Q. Were they were they Tom's things?	23 Q. Multiple of your children are a U.S.
24 A. Yes.	24 citizen.
25 Q. Do you know who left the box there?	25 A. Yes.
D 44	P 101
Page 119	
1 A. I don't.	1 Q. Are you familiar with the requirements for
1 A. I don't. 2 Q. Do you think it may have been Tom?	1 Q. Are you familiar with the requirements for2 U.S. citizenship by birth?
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Pages 122..125

	July 08	, 2	J22 Pages 122125
1 1 0/00	Page 122	1	Page 124
1 A. Okay		1	communications with Carolyn Olson through
1	is Bruce Lemons?	2	Telegram and a true and correct copy of the
	a good friend of Tom's and a and a	3	documents I sent to Carolyn through
1	for a while. They met or they went	4	Telegram."
	ol at the same time, and then they worked	5	So let's talk about the first sentence
_	vell, they both went to	6	there, that you reached out to him on Telegram on
	arification by the Reporter.)	7	June 18th.
	VITNESS: Were in Colorado at the same	8	You know that's true, don't you?
9 time.		9	A. Yes. I don't know if it's June 18th. I
10 BY MS. VA		10	think it's June 17th here, but
	vou know who Bruce works for?	11	Q. You did reach out to him in June
	ay Tom, but I (shrugs).	12	A. Yes.
	y. Are you aware of Tom ever backdating	13	Q on Telegram?
14 documents	5?	14	A. I reached out to yes.
15 A. Yes.		15	Q. And you did ask him to give you the trust
	e you ever personally witnessed that?	16	documents for the White Buffalo and Majestic Trusts;
17 A. Yes.			right?
	you aware of Tom signing documents for	18	A. I don't recall, but according to this, yes.
19 other indiv		19	It shows here.
20 A. I dor		20	Q. Well, we looked specifically at
	alked a lot about your conversation with	21	A. Right.
1	ying to piece together how you obtained	22	Q the photograph of you
	act information.	23	A. Yes. That's what I said.
	o you remember the specifics of your	24	Q in which you said:
25 conversati	on with Ephraim about that?	25	"Is there any way for me to get the trust
	Page 123		Page 125
1 A. I don'		1	documents for White Buffalo and Majestic
2 Q. So y	ou were just making assumptions about	1 2	
1		2	Trusts?"
3 what may o	r may not have been said?	3	A. Yes.
3 what may o		3	A. Yes. Q. That is what you wrote, isn't it?
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3 what may of 4 A. Yes. 5 MR. Jo 6 THE V 7 MS. V. 8 MR. Jo 9 questions. 10	ORDAN: Objection. Leading. VITNESS: Yes. AUGHN: That's it. ORDAN: I have a few follow-up	3 4 5 6 7 8 9	 A. Yes. Q. That is what you wrote, isn't it? A. I believe so. Q. And that's your picture; right? A. That is. Q. Is there any question in your mind that this exchange of text messages took place between you and Tim?
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3 what may of 4 A. Yes. 5 MR. John 19 MS. V. 8 MR. John 10 MR. John 10 MR. John 11 F. 12 BY MR. JOhn 13 Q. First	ORDAN: Objection. Leading. VITNESS: Yes. AUGHN: That's it. DRDAN: I have a few follow-up URTHER EXAMINATION RDAN: to fall, would you turn to Exhibit 7	3 4 5 6 7 8 9 10 11 12 13	 A. Yes. Q. That is what you wrote, isn't it? A. I believe so. Q. And that's your picture; right? A. That is. Q. Is there any question in your mind that this exchange of text messages took place between you and Tim? A. No. Q. Okay. Now, you were asked what happened to your copies of the pages that show your text messages
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3 what may of 4 A. Yes. 5 MR. Jo 6 THE W 7 MS. V. 8 MR. Jo 9 questions. 10 11 F 12 BY MR. JO 13 Q. First 14 and to Bate 15 Coun	DRDAN: Objection. Leading. VITNESS: Yes. AUGHN: That's it. DRDAN: I have a few follow-up URTHER EXAMINATION RDAN: of all, would you turn to Exhibit 7 es No. 0002. sel for Ephraim Olson also asked you	3 4 5 6 7 8 9 10 11 12 13 14 15	 A. Yes. Q. That is what you wrote, isn't it? A. I believe so. Q. And that's your picture; right? A. That is. Q. Is there any question in your mind that this exchange of text messages took place between you and Tim? A. No. Q. Okay. Now, you were asked what happened to your copies of the pages that show your text messages with Tim. Why don't you have those?
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3 what may of 4 A. Yes. 5 MR. JG 6 THE W 7 MS. V. 8 MR. JG 9 questions. 10 11 F 12 BY MR. JO 13 Q. First 14 and to Bate 15 Coun 16 whether or 17 be true. At 18 to the last 19 "On Jun 20 on Teleg 21 confider 22 asking, to 23 to get th 24 and Maje	DRDAN: Objection. Leading. WITNESS: Yes. AUGHN: That's it. DRDAN: I have a few follow-up URTHER EXAMINATION RDAN: of all, would you turn to Exhibit 7 es No. 0002. sel for Ephraim Olson also asked you not you knew things in this affidavit to nd I want to reference you to the second paragraph. Here Mr. Akarapanich swears: e 18, Carolyn Olson reached out to me gram. She also asked about atial information from the firm for example, 'Is there any way for me the trust documents for White Buffalo estic Trusts?' Attached as Exhibit B	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. Yes. Q. That is what you wrote, isn't it? A. I believe so. Q. And that's your picture; right? A. That is. Q. Is there any question in your mind that this exchange of text messages took place between you and Tim? A. No. Q. Okay. Now, you were asked what happened to your copies of the pages that show your text messages with Tim. Why don't you have those? A. Because Telegram, after a certain period of time, if you don't communicate with the person, deletes your stuff. Q. Okay. So those were automatically deleted in your A. Yes. Q phone? Look again at 163. What's the date right above the bubble where
3 what may of 4 A. Yes. 5 MR. JG 6 THE W 7 MS. V. 8 MR. JG 9 questions. 10 11 F 12 BY MR. JO 13 Q. First 14 and to Bate 15 Coun 16 whether or 17 be true. At 18 to the last 19 "On Jun 20 on Teleg 21 confider 22 asking, f 23 to get th 24 and Maje	DRDAN: Objection. Leading. WITNESS: Yes. AUGHN: That's it. DRDAN: I have a few follow-up URTHER EXAMINATION RDAN: of all, would you turn to Exhibit 7 es No. 0002. sel for Ephraim Olson also asked you not you knew things in this affidavit to nd I want to reference you to the second paragraph. Here Mr. Akarapanich swears: e 18, Carolyn Olson reached out to me gram. She also asked about atial information from the firm for example, 'Is there any way for me e trust documents for White Buffalo	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Yes. Q. That is what you wrote, isn't it? A. I believe so. Q. And that's your picture; right? A. That is. Q. Is there any question in your mind that this exchange of text messages took place between you and Tim? A. No. Q. Okay. Now, you were asked what happened to your copies of the pages that show your text messages with Tim. Why don't you have those? A. Because Telegram, after a certain period of time, if you don't communicate with the person, deletes your stuff. Q. Okay. So those were automatically deleted in your A. Yes. Q phone? Look again at 163.

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Page 126	
1 A. June 18th.	1 assumes facts not in evidence. You said
2 Q. And what's the date in Mr. Akarapanich's	2 December 18th.
3 affidavit?	3 MR. JORDAN: I'm sorry. My mistake.
4 A. June 18th.	4 BY MR. JORDAN:
5 Q. Same date; right?	5 Q. On June the 18th of 2020 when you solicited
6 A. (Nods head.)	6 the document from Mr. Akarapanich, you were not a
7 Q. Right?	7 trustee of the Ruth Doxey Family Trust, were you?
8 A. Right.	8 A. Not that I know of.
9 Q. All right. Let's look at Exhibit 6, and	9 Q. All right. Let's look at the trust that
10 we'll start on page 0008. You looked at this with	10 begins at Bates page No. 029.
11 counsel a few moments ago.	11 This is the George Whitehead Family Trust;
12 This relates to the William Bell Hardy	12 correct?
13 Trust; right?	13 A. Correct.
14 A. Right.	14 Q. And you were an original trustee of this
15 Q. And you were an original trustee of this	15 trust?
16 trust; correct?	16 A. Yes.
17 A. Yes.	17 Q. As of June the 18th of 2020, were you still
18 Q. On June the 18th of 2020 when you	18 a trustee of this trust?
19 received	19 A. I don't know.
MR. HOFFMAN: Can you hold on a second,	20 Q. Have you ever been a Canadian citizen?
21 David.	21 A. Yes.
22 THE WITNESS: Where are we	22 Q. No?
23 MR. HOFFMAN: Yeah, it's 8. Go up. There	23 A. Yes.
24 you go.	24 Q. Yes?
25 ///	25 Have you are you now a United States
Page 127	Page 129
1 BY MR. JORDAN:	Page 129
Page 127 1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this	
1 BY MR. JORDAN:	1 citizen?
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this	1 citizen? 2 A. I'm both Canadian and U.S.
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to	 1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship?
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the	1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do.
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust?	 1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know.	 1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not 6 as a U.S. citizen you are an excluded person from
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know. 7 Q. Let's look at the trust that begins on 0016.	 1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not 6 as a U.S. citizen you are an excluded person from 7 being a beneficiary of these trusts?
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know. 7 Q. Let's look at the trust that begins on 0016. 8 It's the Ruth Doxey Trust.	 1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not 6 as a U.S. citizen you are an excluded person from 7 being a beneficiary of these trusts? 8 A. I don't know.
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know. 7 Q. Let's look at the trust that begins on 0016. 8 It's the Ruth Doxey Trust. 9 Do you see that?	 citizen? A. I'm both Canadian and U.S. Q. You have dual citizenship? A. I do. Q. What is your understanding of whether or not as a U.S. citizen you are an excluded person from being a beneficiary of these trusts? A. I don't know. Q. Let's turn to Bates page No. 049.
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know. 7 Q. Let's look at the trust that begins on 0016. 8 It's the Ruth Doxey Trust. 9 Do you see that? 10 A. Yes.	1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not 6 as a U.S. citizen you are an excluded person from 7 being a beneficiary of these trusts? 8 A. I don't know. 9 Q. Let's turn to Bates page No. 049. 10 This is the Trust Settlement for the 11 Thomas H. Olson Trust.
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know. 7 Q. Let's look at the trust that begins on 0016. 8 It's the Ruth Doxey Trust. 9 Do you see that? 10 A. Yes. 11 Q. And you testified, and you can see from the 12 document, that you were an original trustee of this	1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not 6 as a U.S. citizen you are an excluded person from 7 being a beneficiary of these trusts? 8 A. I don't know. 9 Q. Let's turn to Bates page No. 049. 10 This is the Trust Settlement for the 11 Thomas H. Olson Trust.
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know. 7 Q. Let's look at the trust that begins on 0016. 8 It's the Ruth Doxey Trust. 9 Do you see that? 10 A. Yes. 11 Q. And you testified, and you can see from the 12 document, that you were an original trustee of this 13 trust; right?	1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not 6 as a U.S. citizen you are an excluded person from 7 being a beneficiary of these trusts? 8 A. I don't know. 9 Q. Let's turn to Bates page No. 049. 10 This is the Trust Settlement for the 11 Thomas H. Olson Trust. 12 You were a settlor of this trust; correct? 13 A. Correct.
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know. 7 Q. Let's look at the trust that begins on 0016. 8 It's the Ruth Doxey Trust. 9 Do you see that? 10 A. Yes. 11 Q. And you testified, and you can see from the 12 document, that you were an original trustee of this 13 trust; right? 14 A. Right.	1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not 6 as a U.S. citizen you are an excluded person from 7 being a beneficiary of these trusts? 8 A. I don't know. 9 Q. Let's turn to Bates page No. 049. 10 This is the Trust Settlement for the 11 Thomas H. Olson Trust. 12 You were a settlor of this trust; correct? 13 A. Correct. 14 Q. Were you ever a trustee of this trust?
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know. 7 Q. Let's look at the trust that begins on 0016. 8 It's the Ruth Doxey Trust. 9 Do you see that? 10 A. Yes. 11 Q. And you testified, and you can see from the 12 document, that you were an original trustee of this 13 trust; right? 14 A. Right. 15 Q. Right?	1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not 6 as a U.S. citizen you are an excluded person from 7 being a beneficiary of these trusts? 8 A. I don't know. 9 Q. Let's turn to Bates page No. 049. 10 This is the Trust Settlement for the 11 Thomas H. Olson Trust. 12 You were a settlor of this trust; correct? 13 A. Correct. 14 Q. Were you ever a trustee of this trust? 15 A. I don't know.
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know. 7 Q. Let's look at the trust that begins on 0016. 8 It's the Ruth Doxey Trust. 9 Do you see that? 10 A. Yes. 11 Q. And you testified, and you can see from the 12 document, that you were an original trustee of this 13 trust; right? 14 A. Right. 15 Q. Right? 16 A. Yes.	1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not 6 as a U.S. citizen you are an excluded person from 7 being a beneficiary of these trusts? 8 A. I don't know. 9 Q. Let's turn to Bates page No. 049. 10 This is the Trust Settlement for the 11 Thomas H. Olson Trust. 12 You were a settlor of this trust; correct? 13 A. Correct. 14 Q. Were you ever a trustee of this trust? 15 A. I don't know. 16 Q. Let's turn to Bates page No. 0063.
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know. 7 Q. Let's look at the trust that begins on 0016. 8 It's the Ruth Doxey Trust. 9 Do you see that? 10 A. Yes. 11 Q. And you testified, and you can see from the 12 document, that you were an original trustee of this 13 trust; right? 14 A. Right. 15 Q. Right? 16 A. Yes. 17 Q. Now, if you'd turn to Bates page No. 028.	1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not 6 as a U.S. citizen you are an excluded person from 7 being a beneficiary of these trusts? 8 A. I don't know. 9 Q. Let's turn to Bates page No. 049. 10 This is the Trust Settlement for the 11 Thomas H. Olson Trust. 12 You were a settlor of this trust; correct? 13 A. Correct. 14 Q. Were you ever a trustee of this trust? 15 A. I don't know. 16 Q. Let's turn to Bates page No. 0063. 17 This is the Trust Settlement for the White
1 BY MR. JORDAN: 2 Q. On June 18th of 2020 when you received this 3 document in response to your request to 4 Mr. Akarapanich, were you still a trustee of the 5 William William Bell Hardy Trust? 6 A. I don't know. 7 Q. Let's look at the trust that begins on 0016. 8 It's the Ruth Doxey Trust. 9 Do you see that? 10 A. Yes. 11 Q. And you testified, and you can see from the 12 document, that you were an original trustee of this 13 trust; right? 14 A. Right. 15 Q. Right? 16 A. Yes. 17 Q. Now, if you'd turn to Bates page No. 028. 18 Do you see that in December of 2010, you	1 citizen? 2 A. I'm both Canadian and U.S. 3 Q. You have dual citizenship? 4 A. I do. 5 Q. What is your understanding of whether or not 6 as a U.S. citizen you are an excluded person from 7 being a beneficiary of these trusts? 8 A. I don't know. 9 Q. Let's turn to Bates page No. 049. 10 This is the Trust Settlement for the 11 Thomas H. Olson Trust. 12 You were a settlor of this trust; correct? 13 A. Correct. 14 Q. Were you ever a trustee of this trust? 15 A. I don't know. 16 Q. Let's turn to Bates page No. 0063. 17 This is the Trust Settlement for the White 18 Buffalo Trust; correct?
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